

IN UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Harrisonburg Division

JEFFERY T. GARRIS,

Plaintiff,

V.

933387 ONTARIO LTD. d/b/a  
REMEX EXPRESS, *et al.*

Defendants.

KAREN J. GARRIS,

Plaintiff,

V.

933387 ONTARIO LTD. d/b/a  
REMEX EXPRESS, *et al.*

Defendants.

**DEFENDANTS' MOTION IN LIMINE AS TO**  
**FUTURE WAGE LOSS AND UNDISCLOSED EVIDENCE**

Defendants 933387 Ontario Ltd., d/b/a Remex Express and Stewart Todd Scott, by the undersigned counsel, respectfully move this Court for an order excluding and/or limiting the evidence Plaintiff's seek to introduce with respect to plaintiff Karen Garris' claim for future wage loss and exhibits not previously disclosed in discovery. For the reasons set forth in the accompany brief, Defendants are entitled to the relief sought.

WHEREFORE, 933387 Ontario Ltd., d/b/a Remex Express and Stewart Todd Scott respectfully requests that the Motion *In Limine* be granted and that any such evidence or testimony be excluded or limited at trial.

933387 ONTARIO LTD. d/b/a REMEX  
EXPRESS and STEWART TODD SCOTT  
*By Counsel*

/s/

---

Virginia M. Sadler  
Virginia State Bar No. 48736  
Attorney for 933387 ONTARIO LTD., d/b/a  
REMEX EXPRESS, 933387 ONTARIO LTD.,  
and STEWART TODD SCOTT  
JORDAN COYNE LLP  
10509 Judicial Drive, Suite 200  
Fairfax, Virginia 22030  
(Tel.) (703) 246-0900  
(Fax) (703) 591-3673  
E-Mail: [v.sadler@jocs-law.com](mailto:v.sadler@jocs-law.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 11, 2018, I electronically filed the foregoing Defendants' Motion *In Limine* with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Thomas A. Schultz, Jr., Esquire  
Virginia State Bar No. 12781  
240 Merrifield Lane  
Winchester, Virginia 22602  
(Tel.) (540) 722-2801  
(Fax) (540) 722-2803  
E-Mail: [tschultzlaw@gmail.com](mailto:tschultzlaw@gmail.com)  
*Counsel for Plaintiff*

\_\_\_\_\_/s/  
Virginia M. Sadler  
Virginia State Bar No. 48736  
Attorney for 933387 ONTARIO LTD., d/b/a  
REMEX EXPRESS, 933387 ONTARIO LTD.,  
and STEWART TODD SCOTT  
JORDAN COYNE LLP  
10509 Judicial Drive, Suite 200  
Fairfax, Virginia 22030  
(Tel.) (703) 246-0900  
(Fax) (703) 591-3673  
E-Mail: [v.sadler@jocs-law.com](mailto:v.sadler@jocs-law.com)